

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 12823
)	9/11/06 Agenda Item No. 2

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF
DEBTORS' MOTION TO COMPEL ASBESTOS PERSONAL INJURY CLAIMANTS
TO RESPOND TO THE W.R. GRACE ASBESTOS PERSONAL INJURY
QUESTIONNAIRE IN EXCESS OF FIVE (5) PAGES**

W.R. Grace & Co. and its affiliated companies (collectively, "Grace" or Debtors") respectfully request that this Court grant Grace leave to file a ten (10) page reply brief, accompanied by a single page exhibit, in support of its Motion to Compel Asbestos Personal Injury Claimants to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire ("Motion to Compel") (Dkt. No. 12823) (Jul. 17, 2006). In support of this motion, Debtors state:

1. On July 17, 2006, Grace moved to compel personal injury claimants who returned the W.R. Grace Asbestos Personal Injury Questionnaire. Through an agreement reached with counsel for various individual Claimants and with the Court, Grace was granted leave to file a reply brief in support of its motion.
2. In response to the motion, counsel for various personal injury Claimants as well as the Official Committee of Asbestos Personal Injury Claimants filed 22 separate responses, which comprised (excluding exhibits) 146 pages of argument.
3. In light of the volume of responses received, the Court's usual five-page limit on reply briefs (which includes any exhibits to the reply brief) does not allow Grace to fully and fairly address the various arguments raised in the 22 separate responses to the Motion to Compel.
4. Grace believes that a modest extension of 5 additional pages, plus an allowance for a single page exhibit, rendering its reply brief eleven pages in total will be sufficient to allow a full and fair reply in support of the Motion to Compel.

WHEREFORE, Grace respectfully requests that this Court grant this motion and allow Debtors to file a reply brief that, with an exhibit, totals eleven (11) pages.

Wilmington, Delaware
Dated: August 25, 2006

Respectfully submitted,

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